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 Attorney for Debtors

7 UNITED STATES BANKRUPTCY COURT
 8 FOR THE DISTRICT OF NEVADA

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10 IN RE:
 11 SILVER STATE BROADCASTING,
 12 LLC,
 13 Debtor.
 14 AFFECTS THIS DEBTOR
 15 AFFECTS GOLDEN STATE
 BROADCASTING, LLC
 16 AFFECTS MAJOR MARKET RADIO LLC
 17 AFFECTS ALL DEBTORS

Case No. 21-14978-abl
 (Chapter 11)

Jointly Administered with:

21-14979-abl	Golden State Broadcasting, LLC
21-14980-abl	Major Market Radio LLC

**DECLARATION OF EDWARD R. STOLZ
 IN SUPPORT OF JOINTLY
 ADMINISTERED DEBTORS' FIRST
 MOTION TO EXTEND EXCLUSIVITY
 PERIODS UNDER 11 U.S.C. § 1121(D)(1)**

Hearing Date: March 16, 2022
 Hearing Time: 1:30 p.m.

21 EDWARD R. STOLZ, under penalty of perjury, declares and states as follows:

22 1. I am over the age of 18 years, am mentally competent and have personal
 23 knowledge of the matters set forth in this Declaration. If called upon as a witness, I could and
 24 would competently testify to these matters.

25 2. I am the manager and sole shareholder of Royce International Broadcasting Corp.,
 26 sole member of Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major
 27 Market LLC, all Nevada limited liability companies which own certain FCC radio station licenses
 28 identified under call signs KFRH, KREV, KRCK-FM, KBET(AM) and several FM translator

1 stations (collectively the "Radio Stations"). I have owned and operated radio stations in California
 2 and Nevada for over 40 years. I am not just an owner; I am also a broadcast engineer who has
 3 constructed many broadcasting stations, from the ground up. In addition to designing, installing,
 4 calibrating, operating, and maintaining broadcast equipment over the years, I have built each of
 5 the FM stations (KFRH, KREV and KRCK and the translators) essentially from the ground up.

6 3. I have read the Debtors' REPLY TO OBJECTION TO JOINTLY
 7 ADMINISTERED DEBTORS' FIRST MOTION TO EXTEND EXCLUSIVITY PERIODS
 8 UNDER 11 U.S.C § 1121(D)(1) ("Reply") and attest that the facts stated therein are true and
 9 correct to the best of my knowledge and belief.

10 4. Long before W. Lawrence Patrick was appointed as Receiver over the Debtor's
 11 FM Stations, he convinced me to hire him to market FM station KREV in the San Francisco
 12 market for sale. He and his associate obtained extensive information about the Station in the
 13 course of that engagement, but they never presented a serious offer for the station. Instead, he
 14 switched sides and convinced the plaintiffs in the California District Court litigation to have him
 15 appointed as Receiver for the Debtors' stations.

16 5. More recently, in my attempts to retake control of the Debtors' Radio Station
 17 assets from the Receiver, I have found some of the physical assets have been vandalized, parted
 18 out, and burned/ charred, with wiring severed, and equipment torn out of housings and strewn
 19 about the transmitter room. I also located some assets across state lines at different locations even
 20 though the Receiver never gave notice to me or the Debtors that he was moving those assets.

21 6. The Receiver dismantled the Debtors' Radio Stations operations as they existed
 22 before his appointment, and he has refused to return the assets in the condition in which they were
 23 when he took control. Thus, I have worked diligently to try to rebuild the Radio Stations. I have
 24 restored the Palm Springs station and it is currently back on the air with news/talk programming.
 25 The Radio Stations' prior regular music programming requires new programming personnel and
 26 agreements which the Receiver cancelled when he took control of the Radio Stations. Thus, I am
 27 working on restoring those relationships and agreements.

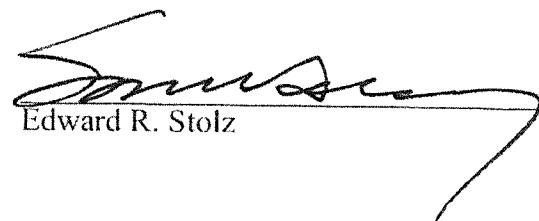
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1 7. I am also diligently working on reconstructing the Las Vegas station and expect to
 2 have that station back on the air in approximately twenty days. During the Receiver's tenure, the
 3 San Francisco station lost its studio facility, its communication links, and its regular
 4 programming. Thus, after I get the Las Vegas station back on air, I will focus on restoring San
 5 Francisco's operations and expect to have that station back on the air in early April. It is almost
 6 unheard of in the industry to rebuild and have stations back on air this quickly considering the
 7 condition in which I have found everything.

8 8. I am prepared to use my own personal assets to rebuild and fund the Debtors'
 9 Radio Stations as necessary to maximize their value for the Debtors' proposed plan of
 10 reorganization. The Debtors will be able to fund their ultimate plan either through my contribution
 11 of new value, ongoing business revenues, partial liquidation of assets, or a combination of
 12 revenues and liquidation. The Radio Stations are located in top broadcasting markets, and with
 13 the right marketing, they have the ability to command significantly more value than what the
 14 Receiver has proposed.

15 9. The Debtors' request for a reasonable extension of their plan exclusivity periods
 16 is not intended to unduly delay these reorganizations. Instead, the Debtors require additional time
 17 simply because we are trying to get up to speed about the Debtors' assets and liabilities after the
 18 Receiver's control over the Radio Station operations.

19 DATED this 9th day of March 2022.

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 22 Edward R. Stoltz
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